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July 21, 1992

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VIA FEDERAL EXPRESS

Federal Communications Commission
Secretary

Ms. Donna R. Searcy
1919 M Street, N.W.
Washington, D.C. 20554

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FCC MAIL BRANCH

RE: **AMENDMENT OF SECTION 73.202(b), TABLE OF ALLOTMENTS FM BROADCAST STATIONS
(SAINT CHARLES, MINNESOTA)**

Dear Ms. Searcy:

Enclosing herewith for filing, please find the original and four copies
of the Petition for Rule Making in the above-referenced proceeding.

Very truly yours,

MOSS & BARNETT
A Professional Association

Brian T. Grogan
Brian T. Grogan

BTG/adg
1137ZKJD
Enclosures

cc: Mr. Garrett G. Lysiak, P.E.

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

IN THE MATTER OF

MM Docket No. 92-_____

Amendment of Section 73.202(b).
Table of Allotments
FM Broadcast Stations
(Saint Charles, Minnesota)

RM-_____

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TO: Chief, Allocations Branch

JUL 22 1992

PETITION FOR RULE MAKING

FCC MAIL BRANCH

St. Charles Broadcasters, by and through its attorneys,
and pursuant to Section 1.420 of the Commission's Rules,
respectfully requests that the Commission institute a rule
making proceeding to make changes in the FM Table of
Allotments, Section 73.202(b) of the Commission's Rules, as
follows:

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<u>Location</u>	<u>Present</u>	<u>Proposed</u>
Saint Charles, MN		299A ¹

In support of this proposal, the following is shown:

1. As described in the attached Engineering Statement,
the proposed coordinates meet FCC spacing requirements set
forth in Section 73.207 of the FCC Rules, as well as FCC signal
coverage requirements set forth in Section 73.315(a) of the FCC
Rules.

2. The proposed allotment would provide Saint Charles,
Minnesota and surrounding environs with full time regional
broadcast service as well as first aural service.

¹ The coordinates for this allotment are 43 58' 10" North
latitude, 92 07' 30" West longitude.

3. If the proposed allotment is granted, St. Charles Broadcasters presently intends to file an application for Channel 299A and, if authorized, to build a station promptly.

4. The public interest would be best served by issuing a notice of proposed rule making and allotting Channel 299A to Saint Charles, Minnesota.

WHEREFORE, for all the foregoing reasons, St. Charles Broadcasters respectfully requests that the Commission commence a rule making proceeding proposing the amendment of the Table of Allotments, FM Broadcast Stations, to include an allotment of Channel 299A to Saint Charles, Minnesota.

Dated: 7-21-92

Respectfully Submitted,

ST. CHARLES BROADCASTERS

By Brian T. Grogan

Brian T. Grogan #210808

MOSS & BARNETT

A Professional Association

Attorneys for St. Charles

Broadcasting

4800 Norwest Center

90 South Seventh Street

Minneapolis, MN 55402-4129

Telephone: (612) 347-0340

481Z140



OWL ENGINEERING, INC.

CONSULTING COMMUNICATIONS ENGINEERS

1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

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OFFICE OF THE SECRETARY

**ENGINEERING STATEMENT
ON BEHALF OF ST. CHARLES BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 225 TO SAINT CHARLES, MINNESOTA**

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July 15 1992

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**ENGINEERING STATEMENT
ON BEHALF OF ST. CHARLES BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 299 TO SAINT CHARLES, MINNESOTA**

Owl Engineering, Inc. has been retained by ST. CHARLES BROADCASTERS (hereafter SCB) to prepare this Engineering Statement in support of a petition to amend the FM Table of Allotments, FCC Rules Section 73.202(b) as follows:

Location
Saint Charles, MN

Present

Proposed
299A

The reference coordinates used for this study are:

43 58' 10" North Latitude
92 07' 30" West Longitude

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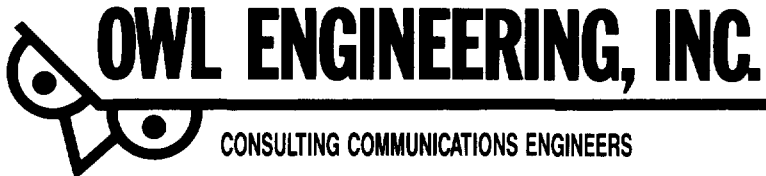
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SCB's proposal will provide Saint Charles, Minnesota with first aural service.

The proposed site will provide 60 dBu (1 mV/m) signal coverage to the population encompassed by an area of approximately 2,502 square kilometers. Saint Charles has a population of 2,642 based on 1990 U.S. Census data.

The proposal of SCB was evaluated to determine if the proposed coordinates would meet FCC spacing requirements. That analysis is attached as Engineering Exhibit E-1.



CONSULTING COMMUNICATIONS ENGINEERS

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**ENGINEERING STATEMENT
ON BEHALF OF ST. CHARLES BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 299 TO SAINT CHARLES, MINNESOTA**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

As can be seen from exhibit E-1, SCB's proposal meets all FCC spacing requirements set forth in section 73.207 of the FCC Rules. There would be approximately 145 square kilometers to select a suitable transmitter site to meet FCC spacing and city coverage requirements. The available area to locate a transmitter is depicted in Engineering Exhibit E-2.

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The proposal of SCB was evaluated to determine if the proposed site would meet FCC signal coverage requirements. The distance from the reference coordinates to the center city coordinates of Saint Charles is 5 kilometers at a bearing of 90 degrees. The three to sixteen kilometer average terrain was computed using the NGDC data base and the distance to contours was computed using the FCC F(50,50) metric curves. The distance to the 70 dBu contour along the radial through the principle city was calculated to be 16.5 kilometers, surpassing the city by some 11 kilometers. Engineering Exhibit E-3 shows the 70 dBu signal contour plotted and demonstrates that all of Saint Charles is encompassed by the 70 dBu contour. Engineering Exhibit E-4 shows the intervening terrain between the reference coordinates and Saint Charles. As can be seen from this exhibit there are no major obstacles in the path to the principle city. Clearly, the proposal of SCB meets the requirements of FCC Rules section 73.315(a).



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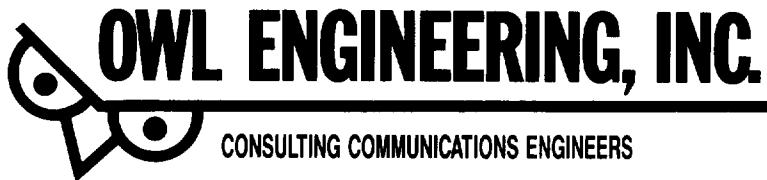
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**ENGINEERING STATEMENT
ON BEHALF OF ST. CHARLES BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 299 TO SAINT CHARLES, MINNESOTA**

Based on the engineering studies provided, the following conclusions can be obtained:

1. The proposal will provide Saint Charles with a full time broadcast service.
2. The proposal will meet the requirements of FCC Rules Section 73.315.
3. The proposal will meet the requirements of FCC Rules Section 73.207.
4. The proposal will provide Saint Charles with first aural service.

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**ENGINEERING EXHIBIT E-1
ST. CHARLES BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 299 TO SAINT CHARLES, MINNESOTA**

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FM Channel 299-A

LATITUDE: 43° 58' 10"
LONGITUDE: 92° 7' 30"

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CHNL	Call	City	Class	Calculated Km.	Required Km.	Delta km.	Bearing °
245		NO CONFLICT					
246		NO CONFLICT					
296		NO CONFLICT					
297		NO CONFLICT					
298	NEW	FMMN Faribault	C2	106.64	106	0.64	288.02
298	WCCNFM	FMWI Neillsville	C1	139.81	133	6.81	60.79
298		FAMN Faribault	C2	105.93	106	-0.07	286.81
298	WCCNFM	FMWI Neillsville	C1	138.61	133	5.61	59.45
298		FAWI Neillsville	C1	139.81	133	6.81	60.79
299		NO CONFLICT					
300		FAIA Waterloo	C	175.71	165	10.71	172.49
300		FAMN Anoka	C	182.13	165	17.13	327.07
300	KFMW	FMIA Waterloo	C	175.71	165	10.71	172.49
300	KQQL	FMMN Anoka	C	182.13	165	17.13	327.07

MEMORIAL HARDWOOD

Scale 1:250,000

20 Statute Miles

15 Nautical Miles

AREA TO LOCATE FOR
CHANNEL 299A
ST. CHARLES, MN

STATE FOREST

AREA TO LOCATE

RICHARD E. DORR

OWL ENGINEERING, INC.
ENGINEERING EXHIBIT E-2

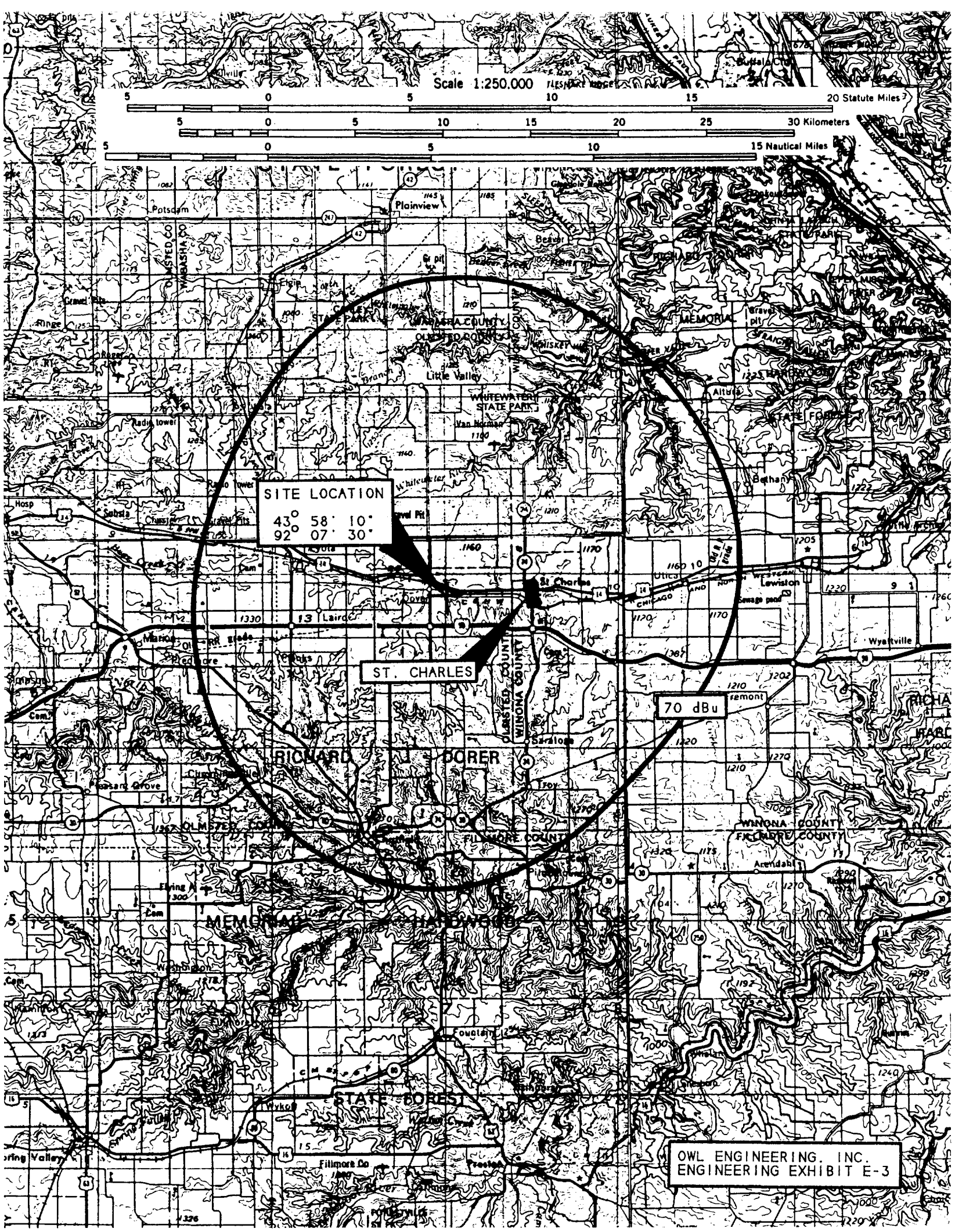
RELOGG 1 MI.

100,000 FEET
(N.W. CENTRAL)
WINONA ST. MI.

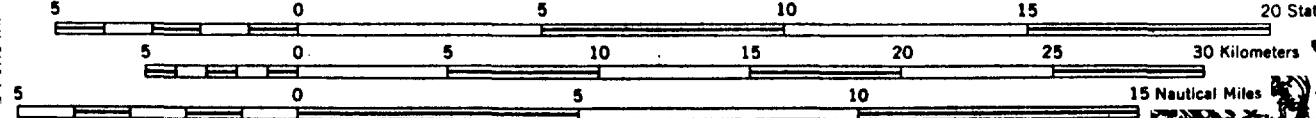
900,000 FEET (IOWA)
WINONA ST. MI.

WINFORD 11 MI.

45°



Scale 1:250,000

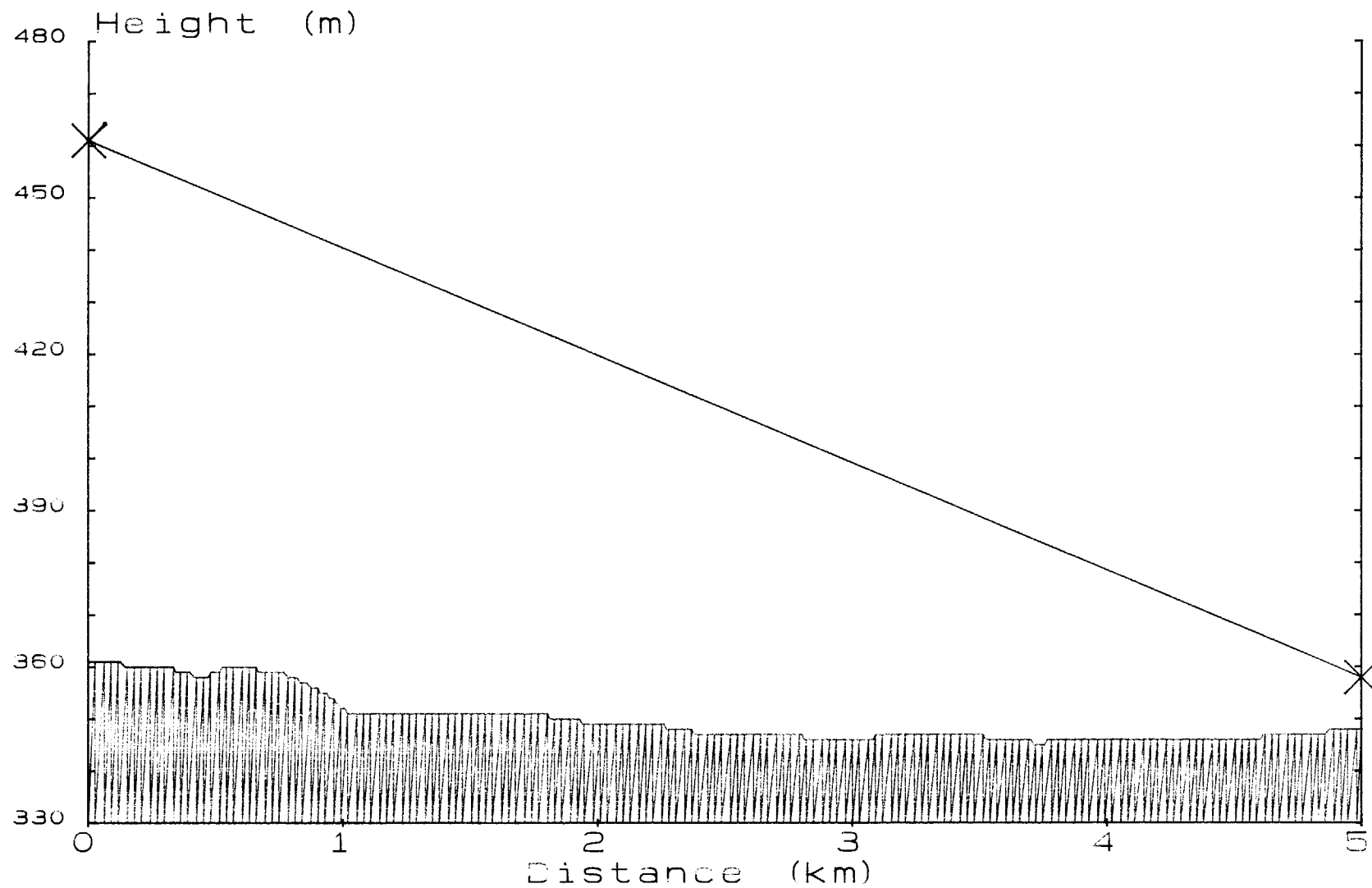


SITE LOCATION
43° 58' 10"
92° 07' 30"

ST. CHARLES

70 dBu

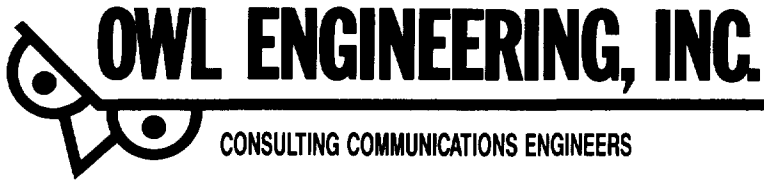
OWL ENGINEERING, INC.
ENGINEERING EXHIBIT E-3



Profile Study for St. Charles, MN

Owl Engineering, Inc. Saint Paul, Minnesota
1306 W. County Rd. F (612) 631-1338

Engineering Exhibit E-4



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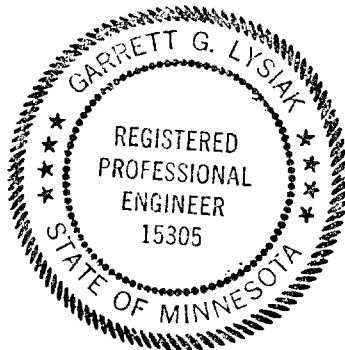
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**ENGINEERING STATEMENT
ON BEHALF OF ST. CHARLES BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 299 TO SAINT CHARLES, MINNESOTA**

AFFIDAVIT

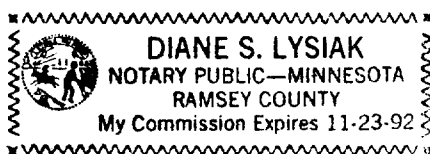
RAMSEY COUNTY)
)
STATE OF MINNESOTA) **ss:**

Garrett G. Lysiak, being first duly sworn, says that he is president of Owl Engineering, Inc., consulting communications engineers with offices in Arden Hills, Minnesota: that his qualifications as an expert in communications engineering are a matter of record with the Federal Communications Commission: that the foregoing exhibit was prepared by him and under his direction; and that the statements contained therein are true of his own personal knowledge except those stated to information and belief and, as to those statements, verily believes them to be true and correct.



Garrett G. Lysiak, P.E.

Subscribed and sworn to before me this date July 15, 1992



Diane S. Lysiak
Notary Public

My commission expires November 23, 1992